



UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

ADAM JOHNSON,

: No. 17 Civ. 1928 (CM)

Plaintiff,

:

- against -

:

CENTRAL INTELLIGENCE AGENCY,

:

Defendant.

:

5/8/2018  
OK  
m

**CONSENT MOTION FOR EXTENSION OF TIME  
TO FILE MOTION FOR COSTS AND ATTORNEY FEES**

Plaintiff Adam Johnson respectfully moves, pursuant to Federal Rule of Civil Procedure 54(d), for an extension of time to file a motion for costs and attorney fees (the "Motion") under the Freedom of Information Act, 5 U.S.C. § 552(a)(4)(E)(ii). Plaintiff respectfully requests that the time to file the Motion, presently due May 10, 2018, be extended to June 25, 2018, the deadline for the Notice of Appeal.

We make this request to permit the parties, which have been in productive communication concerning the resolution of Plaintiff's fees claim, to continue to dialogue. Defendant's counsel has advised Plaintiff that the CIA has no objection to the granting of this Motion.

**Dated: May 7, 2018**

By:

*Dan Novack*

Daniel Novack  
Law Office of Daniel R. Novack  
4 New York Plaza 2<sup>nd</sup> Floor, New York, NY 10004  
[dan@novackmedialaw.com](mailto:dan@novackmedialaw.com)  
Attorney for Plaintiff

NEED ENDORSED